

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

LARRY CALDWELL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 2:06-CV-0207-WKW-CSC
	)	
ANTHONY CLARK, MILLARD H.	)	
McWHORTER & ANNETTE CAIN,	)	
	)	
Defendants.	)	

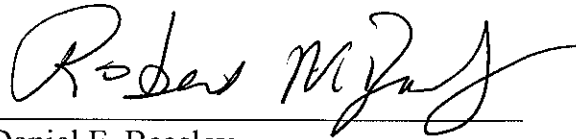
**MOTION FOR EXTENSION OF TIME TO FILE SPECIAL REPORT & ANSWER**

Come now the Defendants, Millard H. McWhorter, M.D. and Annette Cain (erroneously designated in the Complaint as "Anette Cain"), and hereby move this Court for an extension of time within which to file their Special Report and Answer. As grounds for said motion, Defendants hereby set down and assign the following:

1. On March 8, 2006, this Court entered an Order for Special Report. Said Order requires that the Defendants submit a Special Report to this Court within 40 days of March 8, 2006, or by April 17, 2006.
2. Defendants have been attempting to gather the information required by the Court to complete the Special Report and Answer but have been unable to do so due to the unavailability of several of the key personnel who provided health care services to the plaintiff.

**WHEREFORE**, Defendants request a sixty day extension within which to complete their investigation and prepare the Special Report and Answer as directed by this Court.

Respectfully submitted,



Daniel F. Beasley  
Robert N. Bailey, II  
Attorneys for Defendants

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 10 day of April, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that I have mailed by United States Mail, postage prepaid, the document to the following non-CM/ECF participant:

Larry Caldwell  
Covington County Jail  
290 Hillcrest Drive  
Andalusia, AL 36420



Of Counsel